APPENDIX A
ACTION MEMORANDUM

Administrative Order on Consent for Removal Action
Gulfco Marine Maintenance Superfund Site
U.S. EPA Region VI
CERCLA Docket No. _____

9294901

APPENDIX B
LIST OF RESPONDENTS

Administrative Order on Consent for Removal Action
Gulfco Marine Maintenance Superfund Site
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APPENDIX C
GULFCO MARINE MAINTENANCE SUPERFUND SITE MAP

Administrative Order on Consent for Removal Action
Gulfco Marine Maintenance Superfund Site
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APPENDIX D
STATEMENT OF WORK

Administrative Order on Consent for Removal Action
Gulfco Marine Maintenance Superfund Site
U.S. EPA Region VI
CERCLA Docket No. _____

STATEMENT OF WORK
GULFCO MARINE MAINTENANCE SUPERFUND SITE
REMOVAL ACTION

I. INTRODUCTION

A. Purpose of the Statement of Work

This Statement of Work (SOW), sets forth certain requirements ("Work") of the Administrative Settlement Agreement and Order on Consent ("Settlement Agreement") , CERCLE DOCKET NUMBER _____ , for implementation of the Work, including, but not limited to development and implementation of a work plan to design and conduct a removal action to remove or eliminate wastes, thereby eliminating or reducing risks from potential exposure pathways from those wastes at or from the Gulfco Marine Maintenance Superfund Site (the "Site").

The fundamental requirements of the removal action are outlined in the Action Memorandum (the "Action Memorandum") dated _____. The work plan shall be subject to approval by EPA and shall be implemented by the Respondent (as defined in the Settlement Agreement) upon EPA approval.

B. Description of Action

An aboveground storage tank farm ("AST Tank Farm") located in the Southern Area are to be addressed by this Removal Action. The AST Tank Farm is a concrete bermed area containing about 15 aboveground storage tanks. The contents of the tanks are to be removed and the tanks demolished. The concrete containment slab and walls will remain in place, except that the walls shall be breached so that rainfall will freely drain from the structure. Any standing water contained within the bermed area shall be characterized and properly disposed off. Any buried pipes will be capped at the surface after removing the contents of the pipes. The tanks contents and structures, containerized wastes, and debris will be properly disposed of off-site after waste characterization.

The specific objectives for the AST Tank Farm Removal Action is: (1) to prevent the release of chemicals of concern that are stored in the tanks and any other containers, and (2) to prevent the exposure of site workers and visitors to chemicals of concern remaining in the tanks following removal of the stored liquids and other materials. The tanks contain water, various organic phases, oily sludges, and sand, rust solids, and debris. The tank contents include benzene; chloroform; 1,2-dichloroethane; trichloroethylene; tetrachloroethylene; vinyl chloride; and petroleum hydrocarbons in various concentrations.

II. WORK TO BE PERFORMED

A. Preconstruction Activities

Preconstruction activities will consist of a Site inspection and assessment, and preparation of a Work Plan, including a Health and Safety Plan, that addresses the requirements set forth in the Action Memorandum. Site inspection and assessment shall begin with cutting weeds and vegetation as necessary to perform a visual inspection of the removal action area. This inspection shall be performed by Respondents for safety purposes and to identify any drums or containers, which shall be visually inspected, inventoried, labeled with a control number, and logged, if not already done.

The Work Plan shall describe the specific activities in detail to be performed, including deliverables, which Respondents shall perform to implement the removal action described in the Action Memorandum, including the removal and proper off-site disposal of the tanks and tank contents, containerized wastes, and any contaminated soil and debris from the above ground storage tank area at the Site. The Work Plan shall include the following:

- Sampling and Analysis Plan - Respondent shall develop a removal project-specific Sampling and Analysis Plan (SAP), comprised of a Field Sampling Plan (FSP) and project-specific Quality Assurance Project Plan (QAPP) for sample analysis and data handling for any samples collected. The SAP shall be based upon the SOW and EPA guidance, including but not limited to: "Guidance for Choosing a Sampling Design for Environmental Data Collection (EPA QA/G-5S)" (EPA/240/R-02/005, December 2002).

    i. FSP - defines in detail the sampling and data-gathering methods that will be used on the removal action. It will include sampling objectives, sampling rational, sample location and frequency, a detailed description of sampling activities, sample analysis, sampling equipment and procedures, sampling schedule, and sample handling (e.g., sample containers and labels, sample preservation).

    ii. QAPP - describes the sampling objectives and organization, functional activities, lines of communication, and quality assurance and quality control (QA/QC) protocols that will be used to achieve the desired data quality objectives. The QAPP will be prepared in accordance with "EPA Requirements for Quality Assurance Project Plans (QA/R-5)" (EPA/240/B-01/003, March 2001), "Guidance on Quality Assurance Project Plans (QA/G-5)" (EPA/600/R-98/018, February 1998), and "Quality Assurance/Quality Control Guidance for Removal Activities: Sampling QA/QC Plan and Data Validation Procedures") OSWER Directive No. 9360.4-01, April 1,1990). The QAPP will address sampling

procedures, sample chain-of-custody, analytical procedures, and data reduction, validation, reporting, and personnel qualifications.

iii. Respondent shall use laboratories that have a documented Quality System that complies with ANSI/ASCQ E-4 1994, "Specification and Guidance for Quality Systems for Environmental Data Collection and Environmental Technology Programs" (American National Standard, January 5, 1995), and "EPA Requirements for Quality Management Plans (QA/R-2) (EPA/240/B-01/002, March 2001)," or equivalent documentation as determined by EPA. EPA may consider laboratories accredited under the National Environmental Laboratory Accreditation Program ("NELAP") as meeting the Quality System requirements.

iv. All analytical data collected under this Order shall be provided electronically to EPA.

- Construction Quality Assurance Plan - The Construction Quality Assurance Plan (CQAP) describes the project-specific components of the performance methods and quality assurance program to ensure that the completed project meets or exceeds all design criteria, plans, and specifications. The CQAP Plan shall be submitted with the Work Plan. The CQAP shall provide the following:

i. Responsibilities and authorities of all organization and key personnel involved in the Removal Action construction, including EPA and other agencies.

ii. Qualifications of the Construction Quality Assurance (CQA) Officer - establish the minimum training and experience of the CQA Officer and supporting inspection personnel.

iii. Inspection and verification activities - establish the observations and tests that will be required to monitor the construction and/or installation of the components of the removal action. The plan shall include the scope and frequency of each type of inspection to be conducted. Inspections shall be required to verify compliance with environmental requirements and ensure compliance with all health and safety procedures.

iv. Performance standards and methods - describe all performance standards and methods necessary to ensure implementation of the Removal Action. Performance monitoring requirements shall be stated to demonstrate that best management practices have been implemented.

v. Documentation - establish the reporting requirements for construction quality assurance activities. This shall include such items as daily and weekly summary reports, inspection data sheets, problem identification and corrective measures reports, design acceptance reports, and final documentation. A

description of the provisions for final storage of all records consistent with the requirements of the Settlement Agreement shall be included.

vi. Photo-documentation - describe provisions for the detailed photo-documentation of the removal activities.

- Regulatory Compliance Plan - Describes the Applicable or Relevant and Appropriate Requirements (ARARs) and the procedures for meeting the substantive requirements of any permits.

- Waste Management Plan - Describes procedures for sampling waste and the criteria for waste classification. The plan will also describe waste handling procedures, the layout for the waste staging and loading areas, and the procedures for manifesting and tracking the loads. Hazardous and non-hazardous wastes, as well as non-waste materials, shall be handled and managed in accordance with all applicable or relevant and appropriate requirements by the Respondents. The location and name of disposal facilities that will receive any wastes shall be provided.

  Although appropriate on-Site processing may be performed by the Respondents, contaminated liquids, sludges, debris, soils and any containerized wastes on Site shall be properly transported by the Respondents to authorized off-Site facilities for management and final disposal. Prior to shipping hazardous materials off-Site, the Respondents shall ensure that the requirements of the applicable U.S. Department of Transportation ("DOT") regulations contained in 49 C.F.R. 173, 178, and 179 are met, as well as any other applicable requirements. Prior to shipping hazardous materials off-Site, containers shall be labeled by the Respondents and the transporting vehicle placarded in accordance with the applicable portions of 49 C.F.R. 172 and any other applicable requirements.

  Any off-Site disposal must be in compliance with ARARs, including those applicable or relevant and appropriate regulations promulgated under the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §6901 et seq.. at 40 C.F.R. 260 et seq. The RCRA regulations as cited herein shall also mean any applicable EPA authorized State RCRA Program(s). Compliance with the provisions of the NCP, 40 C.F.R. 300.440, is also mandatory.

- Emissions Control Plan - The emissions control plan describes methods to control volatile emissions from active work areas and material treating/staging areas. The emissions control plan shall include an air monitoring program.

- Contingency Plan- Describes the procedures to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water. The contingency plan will provide detailed procedures to be followed in the event of a spill including, notification, containment, and cleanup. The plan will also

describe the procedures to be followed for movement of equipment and personnel from low-lying areas during a high water event

- Health and Safety Plan (HSP) shall be prepared in accordance with EPA's Standard Operating Safety Guide (PUB 9285.1-03, PB 92-963414, June 1992) and shall comply with all currently applicable regulations found at 29 CFR 1910.120, and shall ensure the protection of the public health and safety during performance of on-Site work under the Settlement Agreement. The existing Site HSP may be updated as necessary to address the work to be performed. Respondents shall incorporate all changes to the plan recommended by EPA and shall implement the plan during the pendency of the removal action.

- Schedule

B. Mobilization and Site Preparation

Following written approval of the Work Plan, the Respondents shall commence and fully implement all actions required under the Work Plan, under the oversight of the RPM/OSC and any designated EPA representatives. Mobilization and site preparation will involve mobilizing personnel, equipment, supplies and incidentals onto the project site; establishing all offices and facilities necessary to implement the project; and preparation of the site for the construction work. The major components of site preparation are:

- Utility Connections - Supplying electrical and potable water sources within the work area limits.

- Clearing and Grubbing - Clearing and grubbing and/or mowing areas as required for access to the work and surrounding areas and for constructing roads, work areas, and staging areas.

- Temporary Road Construction - Constructing temporary roads as necessary to provide access and egress to the site, and access and egress to the work areas.

- Work/Staging Area - Constructing work, staging and containment areas.

C. Removal

The liquid and sludge/solid contents of the above ground storage tanks shall be removed from the tanks and either recycled or disposed of at an appropriate facility. Further, the tanks shall be decontaminated and removed from the Site. The removal method for the tank contents will be selected and implemented to control volatile emissions. The removal method will be determined after selection of the remedial contractor. Debris that is encountered will be removed by suitable methods and placed into lined roll-off containers that will be covered except while the debris is being added.

D. Emissions Control

An emissions control plan shall be implemented throughout the removal and material handling phases of the removal to control air emissions. The air exhaust from any vacuum trucks and any other exhaust that potentially could contain volatile emissions shall be captured and treated onsite with vapor-phase carbon.

E. Site Restoration and Demobilization

After completion of the removal action, the temporary roads and work areas will be dismantled and removed. Personnel, equipment, office trailer, supplies and incidentals that were used on the removal project will be removed from the site, unless required for the completion of other work at the Site.

F. Preparation of Final Report

Following satisfactory completion of all removal activities required under the SOW, the Respondents shall prepare and submit to the RPM/OSC for review and approval a Final Report describing all activities performed. The Final Report shall conform, at a minimum, with the requirement set forth in Section 300.165 of the NCP entitled "OSC" Reports." The Final Report shall include a good faith estimate of total costs or a statement of actual costs incurred in complying with the Consent Order, a listing of quantities and types of materials removed off-site or handled on-site, a discussion of removal and disposal options considered for those materials removed, a listing of the ultimate destination(s) of those materials, a presentation of the analytical results of all sampling and analyses performed, and accompanying appendices containing all relevant documentation generated during the removal action *(e.g.*, manifests, invoices, bills, contracts, and permits).